

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

-----x Chapter 11
In re:
SEARS HOLDINGS CORPORATION, et al.
Debtors
Case No. 18-23538 (RDD)
(Jointly Administered)

**JOINDER BY DART WAREHOUSE CORPORATION AND DEDEAUX INLAND
EMPIRE PROPERTIES IN OBJECTION OF VARIOUS LANDLORDS TO NOTICES
OF FILING OF REVISED PROPOSED ORDER (I) APPROVING THE ASSET
PURCHASE AGREEMENT AMONG SELLERS AND BUYER, (II) AUTHORIZING
THE SALE OF CERTAIN OF THE DEBTORS' ASSETS FREE AND CLEAR OF LIENS,
CLAIMS, INTERESTS AND ENCUMBRANCES, (III) AUTHORIZING THE
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS, AND
LEASES IN CONNECTION THEREWITH AND (IV) GRANTING RELATED RELIEF**

DART Warehouse Corporation and Dedeaux Inland Empire Properties (collectively
“DART Warehouse”), by its undersigned counsel, hereby Joins in Objection of Various
Landlords as stated in Docket Numbers 2380 and 2380-1 to the *Notice of Filing Revised
Proposed Order (I) Approving the Asset Purchase Agreement Among Sellers and Buyer (II)
Authorizing the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims,
Interests and Encumbrances, (III) Authorizing the Assumption and Assignment of Certain
Executory Contracts and Unexpired Leases in Connection Therewith and (IV) Granting Related
Relief* [Docket No. 2332] (the “First Revised Proposed Sale Order”) and the *Notice of Filing
Second Revised Proposed Order (I) Approving the Asset Purchase Agreement Among Sellers
and Buyer (II) Authorizing the Sale of Certain of the Debtors' Assets Free and Clear of Liens,
Claims, Interests and Encumbrances, (III) Authorizing the Assumption and Assignment of*

Certain Executory Contracts and Unexpired Leases in Connection Therewith and (IV) Granting Related Relief [Docket No. 2378] (the “Second Revised Proposed Sale Order”).cure amount (the “Cure Objection”).

CONCLUSION

WHEREFORE, the DART Warehouse Corporation and Dedeaux Inland Empire Properties respectfully request that the Court (i) if the Court approves the proposed sale of substantially all of the Debtors’ business assets to the Buyer, any order approving the sale incorporate the changes outlined in the Landlords’ Proposed Sale Order and (ii) grant to the Landlords such other and further relief as is just and appropriate.

Dated: February 4, 2019
San Diego, CA

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